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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,
20 Plaintiff,
21 v.
22 UBER TECHNOLOGIES, INC.,
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF WENDY J. RAY
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

Trial Date: October 2, 2017

1 I, Wendy J. Ray, declare as follows:

2 1. I am a partner at the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based upon matters
4 within my own personal knowledge and if called as a witness, I could and would competently
5 testify to the matters set forth herein. I make this declaration in support of Defendants'
6 Administrative Motion to File Under Seal portions of Defendants' Response to Court-Order
7 Interrogatories and Exhibit A to Their Interrogatory Responses.

8 2. The redacted portion of the response to interrogatory number 3 of Defendants'
9 Responses to Court-Ordered Interrogatories contains technical, proprietary trade secret
10 information, which is highly confidential. If this information was made public, it could
11 irreparably harm Defendants.

12 3. Exhibit A is a list of employee names attached to Defendants' Responses to Court-
13 Ordered Interrogatories for the purpose of answering Interrogatories No. 1 and 2. Disclosure of
14 this list of employee names would threaten the privacy of individuals at a company that is
15 currently the subject of extensive media coverage.

16 4. Defendants' request to seal is narrowly tailored to the material that merits sealing.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct. Executed this 25th day of April, 2017, in San Francisco, California.

19
20 /s/ Wendy J. Ray

Wendy J. Ray

21
22 **ATTESTATION OF E-FILED SIGNATURE**

23 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
24 Declaration. In compliance with General Order 45, X.B., I hereby attest that Wendy J. Ray has
25 concurred in this filing.

26 Dated: April 25, 2017

/s/ Arturo J. González

Arturo J. González